

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

A Limited Liability Partnership

2 Including Professional Corporations

RICHARD J. SIMMONS, Cal. Bar No. 72666

3 [rsimmons@sheppardmullin.com](mailto:rsimmons@sheppardmullin.com)

DEREK R. HAVEL, Cal. Bar No. 193464

4 [dhavel@sheppardmullin.com](mailto:dhavel@sheppardmullin.com)

333 South Hope Street, 43rd Floor

5 Los Angeles, California 90071-1422

Telephone: 213-620-1780

6 Facsimile: 213-620-1398

7 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

A Limited Liability Partnership

8 Including Professional Corporations

HAYLEY S. GRUNVALD, Cal. Bar No. 227909

9 [hgrunvald@sheppardmullin.com](mailto:hgrunvald@sheppardmullin.com)

501 West Broadway, 19<sup>th</sup> Floor

10 San Diego, California 92101

Telephone: 619-338-6500

11 Facsimile: 619-234-3815

12 Attorneys for Defendant BOND CC OAKLAND LLC

13 LAW OFFICES OF PAUL L. REIN

PAUL L. REIN, Cal Bar No. 43053

14 [reinlawoffice@aol.com](mailto:reinlawoffice@aol.com)

CELIA McGUINNESS, Cal Bar No. 159420

15 [cmcguinness@reinlawoffice.com](mailto:cmcguinness@reinlawoffice.com)

CATHERINE M. CABALO, Cal Bar No. 248198

16 [ccabalo@reinlawoffice.com](mailto:ccabalo@reinlawoffice.com)

200 Lakeside Drive, Suite A

17 Oakland, California 94612

Telephone: 510-832-5001

18 Facsimile: 510-832-4787

19 Attorneys for Plaintiff FRANCISCA MORALES

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 FRANCISCA MORALES,

23 Plaintiff,

24 v.

25 WHOLE FOODS MARKET  
26 CALIFORNIA, INC.; BOND CC  
OAKLAND LLC; and DOES 1-10,  
Inclusive

27 Defendants.  
28

Case No. 3:12-cv-01072-CRB  
[Complaint Filed March 2, 2012]  
[Amended Complaint Filed May 10, 2012]

**JOINT STIPULATION TO EXTEND TIME  
FOR PLAINTIFF TO FILE ATTORNEY FEE  
APPLICATION**

(F.R.C.P. Rule 54)

1 WHEREAS, defendant made a FRCP Rule 68 offer of judgment on April 2, 2013(later  
2 amended), and plaintiff accepted it on April 15, 2013;

3 WHEREAS, the notice of acceptance of the Rule 68 offer of judgment will be filed  
4 concurrently with this stipulation;

5 WHEREAS, the offer of judgment specifically excluded any attorney fees and  
6 contemplated that plaintiff's counsel will make application to this Court to recover attorney fees,  
7 litigation expenses and costs;

8 THEREFORE, the parties stipulate and request the Court to set the following briefing  
9 schedule for plaintiff's counsel's application for attorney fees, litigation expenses and costs.  
10 Plaintiff's counsel shall file her application on or before May 31, 2013, defendants shall file their  
11 opposition on or before June 14, 2013, and plaintiff's counsel shall file her reply on or before June  
12 21, 2013.

13 Respectfully submitted,

14  
15 Dated: April 16, 2013

16 LAW OFFICES OF PAUL L. REIN

17  
18 By /s/ Celia McGuinness  
19 PAUL L. REIN  
20 CELIA McGUINNESS  
21 CATHERINE M. CABALO  
Attorneys for Plaintiff  
FRANCISCA MORALES

22 Dated: April 16, 2013

23 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

24  
25 By /s/ Hayley S. Grunvald  
26 RICHARD J. SIMMONS  
27 DEREK R. HAVEL  
28 HAYLEY S. GRUNVALD  
Attorneys for Defendant BOND CC OAKLAND, LLC

**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Hayley S. Grunvald, counsel for Defendant Bond CC Oakland and that I have obtained Ms. Grunvald's authorization to affix her electronic signature to this document.

Dated: April 16, 2013

LAW OFFICES OF PAUL L. REIN

By /s/ Celia McGuinness

PAUL L. REIN

CELIA McGUINNESS

CATHERINE M. CABALO

Attorneys for Plaintiff FRANCISCA MORALES

**ORDER**

Having reviewed and considered the above Stipulation of the parties, and good cause appearing, the Court sets the following briefing schedule for plaintiff's counsel's application for attorney fees, litigation expenses and costs: Plaintiff's counsel shall file her application on or before May 31, 2013, defendant shall file their opposition on or before June 14, 2013, and plaintiff's counsel shall file her reply on or before June 21, 2013.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 25, 2013

